

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

NETCHOICE, LLC,

Plaintiff,

v.

LYNN FITCH, in her official capacity as
Attorney General of Mississippi,

Defendant.

Civil Action No. 1:24-CV-00170-HSO-BWR

JOINT MOTION TO STAY PROCEEDINGS

Plaintiff (NetChoice, LLC) and Defendant (the Attorney General of Mississippi) respectfully move to stay all proceedings in this Court while Defendant's appeal of this Court's order preliminarily enjoining enforcement of Mississippi House Bill 1126 [ECF No. 30] is pending. A stay of proceedings would serve the interest of justice and would protect efficiencies of time and effort for the Court, for counsel, and for the Parties. If either the Fifth Circuit or U.S. Supreme Court stays, reverses, vacates, or otherwise alters any portion of this Court's preliminary injunction, the Parties further request that this Court lift its stay to allow for further proceedings in this Court upon issuance of the Fifth Circuit's appellate mandate. If either Party believes that lifting the stay is warranted for any other reason, the Party will so advise the district court.

The legal basis for this motion is set forth in the attached Memorandum Brief.

Counsel for Plaintiff and counsel for Defendant have conferred and have indicated that each Party consents to this Motion and joins in the request for relief set forth herein.

Counsel for Plaintiff will transmit a Proposed Order to Chambers concurrently with the filing of this Motion, pursuant to L.U. Civ. R. 7(b)(2)(F).

Dated: July 19, 2024

s/Wilson D. Minor

WILSON D. MINOR (MSB #102663)
CLAIRE BARKER (MSB #101312)
Special Assistant Attorneys General
Mississippi Attorney General's Office
Civil Litigation Division
Post Office Box 220
Jackson, Mississippi 39205-0220
Telephone: (601) 359-6279
Email: wilson.minor@ago.ms.gov
claire.barker@ago.ms.gov

*Attorneys for Defendant Lynn Fitch,
Attorney General of Mississippi*

Respectfully submitted,

s/J. William Manuel

J. William Manuel (MBN 9891)
Stephen L. Thomas (MBN 8309)
BRADLEY ARANT BOULT CUMMINGS LLP
One Jackson Place
188 E. Capitol Street, Suite 1000
Jackson, MS 39201
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
wmanuel@bradley.com
sthomas@bradley.com

Steven P. Lehotsky*

Scott A. Keller*

Jeremy Evan Maltz*

LEHOTSKY KELLER COHN LLP
200 Massachusetts Avenue, NW, Suite 700
Washington, DC 20001
(512) 693-8350
steve@lkcfirm.com
scott@lkcfirm.com
jeremy@lkcfirm.com

Jared B Magnuson*

LEHOTSKY KELLER COHN LLP
3280 Peachtree Road NE
Atlanta, GA 30305
(512) 693-8350
jared@lkcfirm.com

Joshua P. Morrow*

LEHOTSKY KELLER COHN LLP
408 W. 11th Street, 5th Floor
Austin, TX 78701
(512) 693-8350
josh@lkcfirm.com

**admitted pro hac vice*

Attorneys for Plaintiff NetChoice, LLC

Certificate of Service

I hereby certify that on July 19, 2024, a true and correct copy of the foregoing Motion and accompanying Memorandum Brief were electronically filed with the Clerk of Court using the CM/ECF system which will send notification to all counsel of record.

J. William Manuel

J. William Manuel (MBN 9891)